

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ALLSTATE LIFE INSURANCE COMPANY, :

Plaintiff, :

v. :

JAMES MOTA, :

Defendant. :

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: Case No. 1:21-cv-908 (LJL)

AGREED ORDER OF DISMISSAL WITH PREJUDICE

The Court, being duly advised, and the parties having agreed, it is HEREBY ORDERED that:

1. Mota, both individually and through any related agencies, agrees not to disclose to any third party or permit any third party to access any Confidential Information, and shall not use any Confidential Information directly or indirectly to effect the solicitation, the purchase, or the sale, of products or services in competition with those sold by Allstate; Mota, both individually and through any related agencies, agrees to cease using and/or return and/or destroy any and all Allstate property currently in his or any related agency's possession;
2. The parties stipulate that "Confidential Information" of Allstate is defined to include, but not be limited to, business plans of Allstate; information regarding the names, addresses, and ages of Allstate policyholders; types of policies; amounts of insurance; premium amounts; the description and location of insured property; the expiration or renewal dates of policies; policyholder listings and


any policyholder information subject to any privacy law; claim information; certain information and material identified by Allstate as confidential or information considered a trade secret as provided by law; and any other information concerning any matters affecting or relating to the pursuits of Allstate that is not otherwise available to the public. "Confidential Information" includes hard copy and electronic documents and information or copies derived therefrom;

3. Plaintiff Allstate agrees that it shall not use Mota's name, image or likeness in connection with any efforts to market or sale any Allstate products;
4. This matter is hereby dismissed, as settled, with prejudice.

Dated: August 11, 2022.

August 12, 2022


So Ordered:



Hon. Lewis J. Liman, USDJ


The undersigned counsel of record for the parties agree to the form and entry of this Order of Dismissal.

DINSMORE & SHOHL LLP

/s/ 

Counsel for Allstate Life Insurance Company

KLUGER HEALEY, LLC

/s/ 

Counsel for James Mota